

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

EAGLE HARBOR HOLDINGS, LLC, and
MEDIUSTECH, LLC,

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:11-cv-05503-BHS

**FORD'S UNOPPOSED MOTION TO
REVISE CASE SCHEDULE**

NOTE ON MOTION CALENDAR:
January 30, 2014

Ford hereby requests a slight modification to the case schedule in order to allow the parties sufficient time to respond to opening expert reports and to depose the multiple experts disclosed in this case. Plaintiffs do not oppose this request so long as no other deadlines are affected. The requested modifications continue the deadlines for rebuttal expert reports and the close of discovery by just one week each. Under the proposed schedule, the dates for motions in limine, pretrial procedures, and trial remain intact. The parties have agreed that they will not use the requested modifications to the rebuttal expert report deadline and the close of discovery as a basis for requesting to move the trial date, or any other date after the close of discovery. Ford respectfully submits that there is good cause to move these two deadlines, as the previous schedules proposed by the parties and adopted by the Court allowed for approximately one month between the deadlines for service of opening expert reports and rebuttal reports. Dkt.

FORD'S UNOPPOSED MOTION
TO REVISE CASE SCHEDULE - 1
No. 3:11-cv-05503-BHS

SAVITT BRUCE & WILLEY LLP
1425 Fourth Avenue Suite 800
Seattle, Washington 98101-2272
(206) 749-0500

1 Nos. 39, 183, 206. This timeline will allow the parties to fully respond to the issues raised in
2 opening expert reports. Ford therefore respectfully moves the Court to enter a schedule
3 reflecting the revised deadlines set out in Exhibit 1.

4 DATED: January 30, 2014

5 **SAVITT BRUCE & WILLEY LLP**

6
7 By: /s/ Duncan E. Manville
8 Duncan E. Manville, WSBA #30304
9 Tel.: (206) 749-0500
Fax: (206) 749-0600
Email: dmanville@sbwllp.com

10 **WILMER CUTLER PICKERING HALE AND DORR LLP**

11 Michael J. Summersgill (*pro hac vice*)
12 Sarah Beigbeder Petty (*pro hac vice*)
60 State Street
Boston, Massachusetts 02109
13 Tel.: (617) 526-6000
14 Fax: (617) 526-5000
Email: michael.summersgill@wilmerhale.com
sarah.petty@wilmerhale.com

15 **WILMER CUTLER PICKERING HALE AND DORR LLP**

16 Todd C. Zubler (*pro hac vice*)
17 Grant K. Rowan (*pro hac vice*)
18 1875 Pennsylvania Avenue NW
Washington, D.C. 20006
19 Tel.: (202) 663-6636
20 Fax: (202) 663-6363
Email: todd.zubler@wilmerhale.com
grant.rowan@wilmerhale.com

21 **BROOKS KUSHMAN P.C.**

22 Frank A. Angileri (*pro hac vice*)
23 John S. Le Roy (*pro hac vice*)
1000 Town Center, 22nd Floor
24 Southfield, Michigan 48075
25 Tel.: (248) 358-4400
26 Fax: (248) 358-3351
Email: fangileri@brookskushman.com
jleroy@brookskushman.com

27 Attorneys for Defendant Ford Motor Company

1 **IT IS SO ORDERED.**

2 Dated this 31 day of January 2014

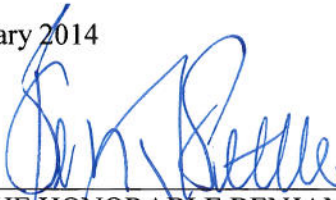
3
4 
5 _____
6 THE HONORABLE BENJAMIN H. SETTLE
7 United States District Judge
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

Exhibit 1

<u>Event</u>	<u>Current Deadline</u>	<u>Revised Deadline</u>
Opening expert reports	2/10/14	2/10/14
Rebuttal expert reports	2/28/14	3/7/14
All motions related to fact discovery must be filed	2/14/14	2/14/14
Expert depositions	2/26/14 – 3/12/14	3/7/14 – 3/21/14
Close of fact and expert discovery	3/14/14	3/21/14
Dispositive Motion (and <i>Daubert</i> Motion) Deadline	3/27/14 (motions noted for 4/18/14)	3/27/14 (motions noted for 4/18/14)
Motions in limine	5/12/14 (motions noted for 5/23/14)	5/12/14 (motions noted for 5/23/14)
Agreed pretrial order, trial briefs, proposed voir dire, and jury instructions due	5/27/14	5/27/14
Pretrial conference	6/2/14	6/2/14
Trial Begins	6/16/14	6/16/14